



UNITED STATES OF AMERICA
Federal Trade Commission
Washington, D.C. 20580



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June 22, 2016

Via electronic mail

The Honorable Elizabeth A. Wolford
United States District Judge
Kenneth B. Keating Federal Building
100 State Street
Rochester, New York 14614

RECEIVED
ELIZABETH A. WOLFORD

JUN 22 2016

United States District Judge
Western District of New York

Re: *FTC v. Unified Global Group, et al.*, Case No. 1:15-cv-00422-EAW

Dear Judge Wolford:

Pursuant to chamber procedures and Federal Rule of Civil Procedure 16(b)(4), Plaintiff Federal Trade Commission ("FTC") respectfully submits this letter requesting that the briefing deadline set forth in the Court's June 16, 2016 order (Dkt. 97) be extended from June 30, 2016, to July 14, 2016. The Court ordered the FTC and Defendant Anthony Coppola to submit briefing addressing the impact of the conversion of Defendant Coppola's bankruptcy case to a Chapter 7 proceeding on the pending motion to modify the Stipulated Preliminary Injunction (Dkt. 35). Counsel for Defendant Coppola consents to the requested extension so long as the deadline is extended for both parties.

Good cause required by Rule 16(b)(4) exists here. I, lead counsel for the FTC in this matter, will be on leave during part of the briefing period, and the attorney handling the bankruptcy proceedings on behalf of the FTC is currently on leave. Neither of us are scheduled to return until after the briefing period expires. Further, the extension would allow the FTC an opportunity to continue its discussions with the Chapter 7 trustee and to consider the impact of the Affirmation of Chapter 7 Trustee (Dkt. 99) filed today and potentially to consult with opposing counsel about it.

Sincerely,

Leah E. Frazier
Counsel for the Federal Trade Commission

SO ORDERED

ELIZABETH A. WOLFORD
United States District Judge
Date 6-22-16

Cc: Arthur G. Baumeister
Counsel for Defendant Anthony Coppola